

STATEMENT OF BASIS

as required by LAC 33:IX.3109, for draft **Louisiana Pollutant Discharge Elimination System Permit No. LA0039136; AI 19892; PER20080001** to discharge to waters of the **State of Louisiana** as per LAC 33:IX.2311.

The **permitting authority** for the Louisiana Pollutant Discharge Elimination System (LPDES) is:

Louisiana Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

- I. **THE APPLICANT IS:** Cameron Parish Water & Wastewater District No. 1
 Wastewater Treatment Plant
 P.O. Box 960
 Cameron, LA 70631

- II. **PREPARED BY:** Angela Marse

- DATE PREPARED:** February 25, 2009

- III. **PERMIT ACTION:** reissue LPDES permit LA0039136, AI 19892; PER20080001

 LPDES application received: July 14, 2008

 LPDES permit issued: March 1, 2004
 LPDES permit expired: February 28, 2009

IV. **FACILITY INFORMATION:**

- A. The application is for the discharge of treated sanitary wastewater from a publicly owned treatment works serving the community of Cameron.

- B. The permit application does not indicate the receipt of industrial wastewater.

- C. The facility is located at 373 Davis Road in Cameron, Cameron Parish.

- D. The treatment facility consists of a three cell oxidation pond. Disinfection is by chlorination.

E. **Outfall 001**

Discharge Location: Latitude 29° 46' 55" North
 Longitude 93° 19' 41" West

Description: treated sanitary wastewater

Design Capacity: 0.685 MGD

Type of Flow Measurement which the facility is currently using:
 Combination Totalizing Meter / Continuous Recorder

V. **RECEIVING WATERS:**

The discharge is into an unnamed canal, thence into the Calcasieu River, thence into the Calcasieu Ship Channel in segment 030401 of the Calcasieu River Basin. This segment is listed on the 303(d) list of impaired waterbodies.

Statement of Basis

LA0039136; AI 19892; PER20080001

Page 2

The designated uses and degree of support for Segment 030401 of the Calcasieu River Basin are as indicated in the table below^{1/}:

Overall Degree of Support for Segment 030401	Degree of Support of Each Use						
	Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
Partial	Full	Full	Full	N/A	N/A	Not Supported	N/A

^{1/}The designated uses and degree of support for Segment 030401 of the Calcasieu River Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2006 Water Quality Management Plan, Water Quality Inventory Integrated Report, Appendix A, respectively.

Section 303 (d) of the Clean Water Act as amended by the Water Quality Act of 1987, and EPA's regulations at 40 CFR 130 require that each state identify those waters within its boundaries not meeting water quality standards. The Clean Water Act further requires states to implement plans to address impairments. LDEQ is developing Total Maximum Daily Loadings Studies (TMDLs) to address impaired waterbodies. Segment 030401 of the Calcasieu River Basin is on the 2006 Integrated 303(d) List of Impaired Waterbodies. The suspected cause of impairment is pathogen indicators.

Monitoring for fecal coliform is the best indicator for the potential presence of pathogenic organisms in wastewater. To protect against potential receiving water impairments due to pathogens, fecal coliform limits have been established in the permit. Permit limits are reflective of water quality standards for shellfish propagation, a designated use of the receiving stream.

VI. ENDANGERED SPECIES:

The receiving waterbody, Subsegment 030401 of the Calcasieu River Basin, is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U. S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

VII. HISTORIC SITES:

The discharge is from an existing facility location, which does not include an expansion beyond the existing perimeter. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the 'Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits' no consultation with the Louisiana State Historic Preservation Officer is required.

Statement of Basis

LA0039136; AI 19892; PER20080001

Page 3

VIII. PUBLIC NOTICE:

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation
Office of Environmental Services Public Notice Mailing List

For additional information, contact:

Mrs. Angela Marse
Water Permits Division
Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

IX. PROPOSED PERMIT LIMITS:**Final Effluent Limits:****OUTFALL 001**

Since the issuance of the previous permit the Total Maximum Daily Load for Toxics for the Calcasieu Estuary has been completed. No pollutants of concern were identified for subsegment 030401 and no TMDL was developed for the subsegment.

The subsegment was also listed as fully supporting all designated uses on the 2002 and 2004 303(d) List. However on the 2006 303(d) List, the subsegment does not support the shellfish propagation use due to the presence of pathogen indicators. As discussed in Section V., fecal coliform effluent limits have been included in the permit. The limits are set according to water quality standards for shellfish propagation designation as described under number one below.

Final limits shall become effective on the effective date of the permit and expire on the expiration date of the permit.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
BOD ₅	171	30 mg/l	45 mg/l	Limits are set in accordance with the Calcasieu River TMDL (WLA 88.03).
TSS	514	90 mg/l	135 mg/l	Limits are set in accordance with the Calcasieu River TMDL (WLA 88.03).

Statement of Basis

LA0039136; AI 19892; PER20080001

Page 4

Other Effluent Limitations:**1) Fecal Coliform**

The discharge from this facility is into a water body which has a designated use of shellfish propagation. According to LAC 33:IX.1113.C.5.b.iv, the fecal coliform standards for this water body are 14/100 ml and 43/100 ml. Therefore, the limits of 14/100 ml (Monthly Average) and 43/100 ml (Weekly Average) are proposed as Fecal Coliform limits in the permit. These limits are being proposed through Best Professional Judgement in order to ensure that the water body standards are not exceeded, and due to the fact that existing facilities have demonstrated an ability to comply with these limitations using present available technology.

2) pH

According to LAC 33:IX.3705.A.1., POTW's must treat to at least secondary levels. Therefore, in accordance with LAC 33:IX.5905.C., the pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time.

3) Solids and Foam

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

X. PREVIOUS PERMITS:

LPDES Permit No. LA0039136: Issued: March 1, 2004
Expired: February 28, 2009

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
	<u>Monthly Avg.</u>	<u>Weekly Avg.</u>	<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow	Report	Report	Continuous	Recorder
BOD ₅	30 mg/l	45 mg/l	2/month	Grab
TSS	90 mg/l	135 mg/l	2/month	Grab
Fecal Coliform Colonies	14	43	2/month	Grab

The permit contains standard pretreatment language.

The permit contains pollution prevention language.

XI. ENFORCEMENT AND SURVEILLANCE ACTIONS:**A) Inspections**

A review of the files indicates the following inspections was performed for this facility.

Date: September 27, 2007

Inspector: Kevin Natali

Findings and/or Violations:

1. No areas of concern were noted. Prior to the site visit, a records review was conducted from April, 2006 to August, 2007.
2. Outfall 001 has a light green color and small amount of solids (algae).
3. After Hurricane Rita, the oxidation pond was drained to repair levees. Collection lines were damaged and the chlorination system destroyed by the Hurricane as well. Camera and smoke testing were conducted and all open ended lines were capped. Plugged lines were cleaned. A new chlorination system and flow devices were also installed.

Statement of Basis

LA0039136; AI 19892; PER20080001

Page 5

B) Compliance and/or Administrative Orders

A review of the files indicates no recent enforcement actions administered against this facility.

C) DMR Review

A review of the discharge monitoring reports for the period beginning **October, 2006** through **December, 2008** revealed no violations.

XII. ADDITIONAL INFORMATION:

The Louisiana Department of Environmental Quality (LDEQ) reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional water quality studies and/or TMDL's. The LDEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDL's for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as requested by the permittee and/or as necessary to achieve compliance with water quality standards. Therefore, prior to upgrading or expanding this facility, the permittee should contact the Department to determine the status of the work being done to establish future effluent limitations and additional permit conditions.

In accordance with LAC 33:IX.2903., this permit may be modified, or alternatively, revoked and reissued, to comply with any applicable effluent standard or limitations issued or approved under sections 301(b)(2)(c) and (D); 304(b)(2); and 307(a)(2) of the Clean Water Act, if the effluent standard or limitations so issued or approved:

- a) Contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
- b) Controls any pollutant not limited in the permit; or
- c) Requires reassessment due to change in 303(d) status of waterbody; or
- d) Incorporates the results of any total maximum daily load allocation, which may be approved for the receiving water body.

Final effluent loadings (i.e. lbs/day) have been established based upon the permit limit concentrations and the design capacity of 0.685 MGD.

Effluent loadings are calculated using the following example:

$$\text{BOD: } 8.34 \text{ lb/gal} \times 0.685 \text{ MGD} \times 10 \text{ mg/l} = 171 \text{ lb/day}$$

Pretreatment Requirements

Based upon consultation with LDEQ pretreatment personnel, standard pretreatment language has been included in the permit.

Statement of Basis

LA0039136; AI 19892; PER20080001

Page 6

At present, the **Monitoring Requirements, Sample Types, and Frequency of Sampling** as shown in the permit are the same as the previous permit. The standard for facilities of flows between 0.5 and 1.0 MGD is 1/week. However, based on a DMR compliance review and EPA Interim Guidance for Performance-Based Reduction of NPDES Permit Monitoring Frequencies, the facility can maintain the same monitoring frequency as the previous permit. (See attached DMR review.)

Effluent CharacteristicsMonitoring Requirements

	<u>Measurement</u>	<u>Sample</u>
	<u>Frequency</u>	<u>Type</u>
Flow	Continuous	Recorder
BOD ₅	2/month	Grab
Total Suspended Solids	2/month	Grab
Fecal Coliform Bacteria	2/month	Grab
pH	2/month	Grab

Pollution Prevention Requirements

The permittee shall institute or continue programs directed towards pollution prevention. The permittee shall institute or continue programs to improve the operating efficiency and extend the useful life of the facility. The permittee will complete an annual Environmental Audit Report **each year** for the life of this permit according to the schedule below. The permittee will accomplish this requirement by completing an Environmental Audit Form which has been attached to the permit. All other requirements of the Municipal Wastewater Pollution Prevention Program are contained in Part II of the permit.

The audit evaluation period is as follows:

Audit Period Begins	Audit Period Ends	Audit Report Completion Date
Effective Date of Permit	12 Months from Audit Period Beginning Date	3 Months from Audit Period Ending Date

XIII. TENTATIVE DETERMINATION:

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in this Statement of Basis.

XIV. REFERENCES:

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 8, "Wasteload Allocations / Total Maximum Daily Loads and Effluent Limitations Policy," Louisiana Department of Environmental Quality, 2005.

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 5, "Water Quality Inventory Section 305(b) Report," Louisiana Department of Environmental Quality, 1998.

Statement of Basis

LA0039136; AI 19892; PER20080001

Page 7

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 11 - "Louisiana Surface Water Quality Standards," Louisiana Department of Environmental Quality, 2004.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Subpart 2 - "The LPDES Program," Louisiana Department of Environmental Quality, 2004.

Low-Flow Characteristics of Louisiana Streams, Water Resources Technical Report No. 22, United States Department of the Interior, Geological Survey, 1980.

Index to Surface Water Data in Louisiana, Water Resources Basic Records Report No. 17, United States Department of the Interior, Geological Survey, 1989.

LPDES Permit Application to Discharge Wastewater, Cameron Parish Water & Wastewater District No. 1, Cameron Parish Water and Wastewater District No. 1, July 14, 2008.